

IN THE UNITED STATES DISTRCIT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

SHIRLEY RADABAUGH,)
Plaintiff,) JURY TRIAL DEMAND
v.)
CLAY TURNER REALTY GROUP, LLC,) DOCKET NO: 1:20-CV-00058-JRH-BKE
Defendant.)

DEFENDANT'S RESPONSE TO
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

COMES NOW, Defendant Clay Turner Realty Group, LLC, ("Defendant"), and submits to the Court this Objection to Plaintiff's Partial Motion for Summary Judgment and contemporaneously files herewith his Brief in Support of the same.

Defendant hereby objects to all claims contained in Plaintiff's Motion for Partial Summary Judgment and Memorandum of Law in Support of Plaintiff's Motion for Partial Summary Judgment on Liability Against Defendant for Copyright Infringement as filed by Plaintiff on November 05, 2020.

Defendant requested and granted an extension of the deadline for response to Plaintiff's Motion through January 11, 2021.

Defendant hereby presents this objection supported by the contemporaneously filed Memorandum of Law in Objecting to Plaintiff's Motion for Partial Summary Judgment on Liability Against Defendant for Copyright Infringement.

WHEREFORE, Defendant hereby requests this Court to:

1. A HEARING be scheduled and heard in this matter;
2. DENY Plaintiff's Motion for Partial Summary Judgment;
3. ISSUE any such further relief deemed by this Court as just and proper.

DATED: This, 11th day of January, 2021.

Respectfully submitted,

/s/ Kristen T. Jones

Kristen T. Jones
Attorney for Clay Turner Realty Group, LLC
GA BAR NO. 632847

TURNER JONES LEGAL, LLC
Post Office Box 1703
Lincolnton, Georgia 30817
(706) 359-3332

CERTIFICATE OF SERVICE

This is to certify that I have served upon parties and opposing counsel a copy of **Defendant's Response to Plaintiff's Motion for Summary Judgment** as follows:

Richard P. Liebowitz
Attorney for Plaintiff
[via CM/ECF Electronic Delivery]
11 Sunrise Plaza, Suite 305
Valley Stream, NY 11580

Dorsey R. Carson, Jr.
Attorney for Plaintiff
[via CM/ECF Electronic Delivery]
2870 Peachtree Road, NW
#915-3234
Atlanta, Georgia 30305

By statutory electronic service or by placing same in the United States mail with adequate postage thereon to assure proper delivery.

This 11th day of January , 2021.

/s/ Kristen T. Jones

Kristen T. Jones
Attorney for Defendant
GA Bar No. 632847

Turner Jones Legal, LLC
Post Office Box 1703
Lincolnton, Georgia 30817
(706) 359-3332